

LENNON, MURPHY & LENNON, LLC  
 Attorneys for Defendant  
 CONGENTRA A.G.  
 The GrayBar Building  
 420 Lexington Avenue, Suite 300  
 New York, New York 10170  
 Telephone: (212) 490-6050  
 Facsimile: (212) 490-6070  
 Kevin J. Lennon

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

SIXTEEN THIRTEEN MARINE S.A.,	:	X
	:	08 CV 1318 (HB)
Plaintiff,	:	
	:	ECF CASE
- against -	:	
CONGENTRA A.G.,	:	
	:	
Defendant.	:	

X

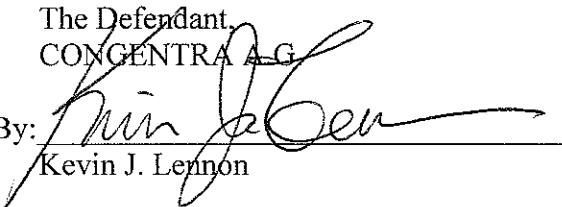
**NOTICE OF MOTION TO VACATE  
OR, ALTERNATIVELY, REDUCE MARITIME ATTACHMENT**

Upon the annexed Declarations of Kevin J. Lennon, Honorable Sir Anthony Colman, Edward Eurof Lloyd-Lewis, Pavel Primak, Alexander Nikolaevich Konykhov, Konstantin Petrunin, and Matthew Montgomery, the exhibits annexed thereto, the accompanying Memorandum of Law and the pleadings and proceedings heretofore had herein, Defendant Congentra A.G. will move this Court before the Honorable Harold Baer, United States Courthouse, 500 Pearl Street, Courtroom 23B, New York, New York on the 17th day of March 2008 at 2:00 o'clock in the p.m., or as soon thereafter as the parties can be heard, for an Order pursuant to Supplemental Rules E(4)(f) and E(6) for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure vacating, or, alternatively, reducing the Ex Parte Attachment Order dated February 20, 2008.

Opposition papers shall be due by March 13, 2008 at 5:00 p.m.; Reply papers shall be due by March 17, 2008 at 9:00 a.m.

Dated: March 5, 2008  
New York, NY

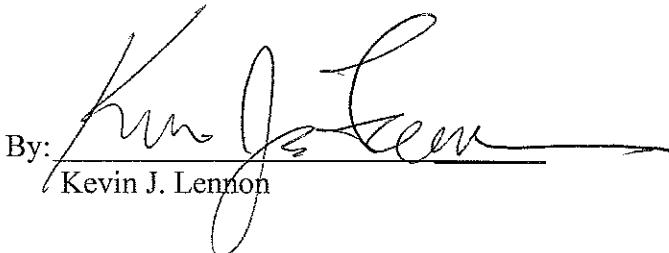
Respectfully submitted,

The Defendant,  
CONCENTRA AG  
By:   
Kevin J. Lennon

LENNON MURPHY & LENNON, LLC  
The GrayBar Building  
420 Lexington Ave., Suite 300  
New York, NY 10170  
(212) 490-6050 (phone)  
(212) 490-6070 (fax)  
[kjl@lenmur.com](mailto:kjl@lenmur.com)

**AFFIRMATION OF SERVICE**

I hereby certify that on March 5, a copy of the foregoing Notice of Motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

By:   
Kevin J. Lennon